

# EQUALITY IMPACT ASSESSMENT

This form is for use where an Equality Impact Assessment has not been carried out before on a service area. Please refer to the 'Equality Impact Assessment Toolkit' which provides guidance on completing the form.

<b>Service area that is being assessed:</b>	Anti-Social Behaviour Hate Incidents
<b>Lead Officer/s:</b>	John Dallison – ASB Officer Keith Eyles – ASB Officer

<b>Service Policies:</b>	<b>Service Procedures</b>
Anti Social Behavior Policy	Anti Social Behavior Procedure
Anti-Social Behaviour Statement of Policy	Anti-Social Behaviour Statement of Procedure
Hate Incidents Policy	Hate Incidents Procedure

<b>Legislation relating to the six strands of Diversity:</b>			
<b>Strand</b>	<b>Legislation</b>	<b>Purpose of the Legislation</b>	<b>HHL Documents</b>
Race	Race Relation (Amendment) Act 2000	Places a duty on public authorities to promote racial equality by working towards the elimination of unlawful discrimination, promoting equality of opportunity & promoting good relations between persons of different racial groups.	Equality and Diversity Framework & Single Equalities Action Plan  Code of Practice on Racial Equality in Housing - Audit
Gender	Sex Discrimination Act 1975	Prohibits sex discrimination & victimization in relation to employment, education, housing & the provision of goods & services	Equality and Diversity Framework & Single Equalities Action Plan
	Equality Act 2006	Introduces a duty on public sector bodies to promote equality of opportunity between men & woman & eliminate sex discrimination. Registered Providers have a regulatory duty in this respect.	Gender Equality Scheme & Action Plan
	Gender Recognition Act	The purpose of the Act is to provide transsexual people with legal	

<b>Legislation relating to the six strands of Diversity:</b>			
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	2004	recognition in their acquired gender. Legal recognition follows from the issue of a full gender recognition certificate by the Gender Recognition Panel.	
Disability	Disability Discrimination Act 2005	Places a duty on all public authorities to eliminate disability discrimination & harassment, promote equality of opportunity between disabled & non-disabled people & take account of a disabled person's disabilities. Registered Providers have a regulatory duty in this respect.	Equality and Diversity Framework & Single Equalities Action Plan  Disability Equality Scheme & Action Plan
Religion or belief	Racial/Religious Hatred Act 2006  Equality Act 2006	Makes it unlawful to stir up hatred against people because of their religious beliefs or lack of them. This can include criminal acts, anti-social behaviour, abuse or harassment or display of material that is threatening, abusive or insulting with the intention or likely effect of stirring up hatred.  Makes it unlawful to discriminate on the grounds of religion or belief in the provision of goods, facilities & services.	Equality and Diversity Framework & Single Equalities Action Plan
Sexual Orientation	Equality Act 2006  Civil Partnership Act 2004	Makes it unlawful to discriminate on the grounds of sexual orientation in the provision of goods, facilities & services.  Provides legal recognition & parity of treatment for same-sex couples and married couples.	Equality and Diversity Framework & Single Equalities Action Plan
Age	Framework for a Fairer Future – Equality Bill	The Bill will include measures to end unjustifiable age discrimination by those providing goods, services & facilities.  Creating a single new Equality Duty on public bodies. The new duty will cover race, disability and gender,	Equality and Diversity Framework & Single Equalities Action Plan

**Legislation relating to the six strands of Diversity:**

Strand	Legislation	Purpose of the Legislation	HHL Documents
		as now, but also include age, sexual orientation, gender reassignment and religion or belief, replacing the three existing, separate duties with a single, more effective framework	

**Customer information literature and other information relating to the service:**  
*(include any relevant Corporate documents)*

- Customer information leaflet: ‘How to report anti-social behaviour, and what we will do to help’
- Customer Information leaflet: ‘Discrimination and Prejudice Hurts’
- Communications Strategy, March 2007. The Communications Strategy is committed to promoting the principles of equality and inclusiveness. It aims to ensure that customers can communicate with us by removing any barriers that may prevent this. The Strategy sets out a commitment to provide information in Braille, Large Print, Audio format and other languages, where requested, to promote equality of access. External communications include a multi-lingual box advertising the availability of the information in alternative languages.
- Equality and Diversity Framework September 2008-2011 and Single Equalities Action Plan.

**Performance Monitoring Information**

- In total, as at November 2008 there were 65 open Anti-Social Behaviour cases. Six new urgent cases and 18 new non-urgent cases were opened during the month. 32 cases were closed.
- 100% of urgent reported cases were responded to within the target time of one working day. 100% of non-urgent reported cases were responded to within the target time of three working days.
- Whilst our dedicated Anti-Social Behaviour database, ReAct, has the capacity to monitor, by diversity, the numbers of customers who are either victims or perpetrators of anti-social behaviour or hate incidents this information is not currently input into the system.

**Please provide details of any initiatives or partnership working relating to equality and diversity issues**

- We are in the process of collecting Resident Census data so that we can tailor our services to meet residents' needs. As at November 2008, 63.1% of tenant census forms had been received.
- We have a 24 hour ASB report line so that victims can report incidents 24 hours a days, 365 days a year.
- Victims of anti-social behaviour who may find it difficult to record anti-social behaviour or hate incidents on Log Sheets can be provided with mobile CCTV, hand-held voice recording equipment and noise monitoring equipment.
- The case management process has been improved through the use of the ReAct database. Information about victims and perpetrators is essential to identify trends and 'hotspots.' Over time, victim and perpetrator profile information may, for example, highlight that BME, disabled or gay/lesbian tenants are more likely to be victims of anti-social behaviour or hate incidents on a particular estate. This will enable the more effective targeting of resources.
- We can provide digital door spy-hole camera equipment for victims of hate incidents/anti-social behaviour. The equipment can be switched on to take a rapid succession of pictures, which can be used to gather evidence.
- Consultation with the Police Hate Crimes Officer and the Council's Race Equality Development Officer was undertaken as part of the Hate Incidents Policy and Procedure development process.
- Customer consultation on the Anti-Social Behaviour and Hate Incidents policies and procedures was undertaken with the Tenancy Services Review Group on 12<sup>th</sup> September 2009. Victims were also involved in the Service Standards development process.

**Colleague diversity training undertaken:**

<b>Event</b>	<b>Delivered by</b>	<b>Date/s</b>
Equality & Diversity	Equality & Diversity Network	April 2007
Equality Impact Assessment Training (Managers)	Carol Trachonitis – Manager Herefordshire Council Corporate Diversity Team  Neville Meredith - Herefordshire Council Corporate Diversity Team	May 2008

# 1. IDENTIFYING THE PURPOSE AND MAIN AIMS OF THE SERVICE?

## 1.1 List below the main aims of the service area:

### **Anti-Social Behaviour**

We take anti-social behaviour very seriously and will respond to serious incidents within one working day and other types of incident within 5 working days.

Anti-social behaviour is defined in the Anti-Social Behaviour Act 2003 as:

*'Conduct, which is capable of causing nuisance or annoyance to any other person; and directly or indirectly relates to, or affects the housing management function of a relevant landlord; or conduct, which consists of, or involves using or threatening to use housing accommodation owned or managed by a relevant landlord for any unlawful purposes.'*

We aim to achieve a balance between enforcement, prevention and rehabilitation.

Our approach to anti-social behaviour is:

1. To be proactive in preventing anti-social behaviour.
2. To support our residents who are experiencing anti-social behaviour.
3. To access appropriate support services where there may be vulnerabilities or underlying factors contributing to anti-social behaviour.
4. To adopt a multi-agency approach to preventing and tackling anti-social behaviour.

### **Hate Incidents**

We take hate incidents very seriously and have set a target to respond to all reports within one working day.

We define a hate incident to be,

*'Any incident, which may or may not constitute a criminal offence, which is perceived by the victim or any other person as being motivated by prejudice or hate.'*

Our approach to Hate Incidents is:

1. Support victims and witnesses.
2. Work in a multi-agency environment.
3. Undertake preventative activity and widely publicise information relating to our policy on hate incidents.
4. Take enforcement action against perpetrators.

**1.1 List below the main aims of the service area:**

- 5. Ensure that all HHL colleagues dealing with hate incidents are fully trained.
- 6. Set performance targets and undertake performance monitoring.

**2. MAKING AN ASSESSMENT OF THE IMPACT OR EFFECTS ON DIFFERENT COMMUNITIES AND CUSTOMER GROUPS.**

The Guidance Notes will help you complete the following section.

**2.1 Race** (*This includes, race, colour, nationality, ethnic origin, national origin*).

List below any relevant customer information that already exists in relation to the service. This could include monitoring information, customer feedback and consultation, complaints etc.

**Resident Census Data** (as at November 2008)

**i. Ethnicity:**

Of the completed forms received 97.7% of residents describe themselves as White British. The remaining 2.3% (94 respondents) describe themselves as follows:

	Total
White - Irish	16
Romany/Gypsy	4
Traveller	8
Any Other White background	39
Asian or Asian British - Indian	3
Asian or Asian British - Pakistani	3
Black or Black British - Caribbean	2
Black or Black British - African	3
Chinese	1
Mixed – White & Black Caribbean	2
Mixed – White & Asian	2
Mixed – White & Black African	1
Any Other mixed background	2
Any other Ethnic group	8

**ii. Anti-Social Behaviour:**

- A total of 342 (10.5%) of respondents said they had been victims of Anti-Social Behaviour.
- Results were far higher for ethnic minorities, with 15 respondents (16.0%) saying that they had been victims.

- Results were higher still for gay/lesbian and bisexual tenants, with a total of 8 (24.2%) of respondents saying that they had been victims.

### **iii. Hate Incidents**

- 166 households (5.1%) reported that they had been victims of harassments/hate incidents.
- Results were far higher for ethnic minorities with 15 responses, which is 16.0% of all ethnic minority responses.
- Results were also very high for gay/lesbian and bisexual respondents, with 13 people saying they had been victims. This equates to 39.4% of gay/lesbian/bisexual responses.

## **2.2 Identify the ways in which your service seeks to promote fair access to people who may be disadvantaged because of their race:**

- The customer information leaflets relating to anti-social behaviour and hate incidents have a language box in Polish, Portuguese and Russian. This says what the leaflet is about and gives information on how to request a translation of the document. These languages are currently used, following advice from Herefordshire Council that they are the most commonly used minority languages in Herefordshire. It is recognised however, that this may not be the case for HHL tenants and that, when data collection is completed, it may be necessary to review this to comply with the minority language needs of HHL tenants.
- Written procedures are in place for HHL colleagues to access interpreters and translation services. We will arrange for main documents to be translated, where necessary. The comprehensive step-by-step guide is available on our intranet. In addition, all front-line officers have received training in how to access the interpreter and translation service.
- All three of our offices, at Legion Way, City Centre and South Wye, have language identification posters on display.
- All our front-line officers carry Language Line Identification cards, which enables the tenant to point to the language they require. The cards also provide information on how to access interpreters by telephone at the point of contact.
- HHL's website has the capability to translate key information into Polish, Russian and Portuguese.
- Incident Log sheets for evidence collection can be written or recorded in the preferred language and we will arrange to have this translated.
- Our Equality & Diversity Framework and Action Plan 2008-2011 sets out our commitment to do all that we can to eliminate discrimination in all areas of diversity, including race.

### **2.3 Identify any potential adverse impact or barriers:**

- Potential language barriers - until census information data is completed for the majority of tenants we cannot be certain that the translation box printed on published information accurately reflects the language needs of HHL tenants.
- Potential under-reporting - until the profile of those reporting anti-social and hate incidents is analysed consistently against baseline resident profile data, we cannot be certain that adverse impacts or barriers are not operating for those who may be disadvantaged because of their race.
- The translatable information on our website does not include that relating to anti-social behaviour and hate incidents.
- Until satisfaction levels with these services are analysed consistently by race we cannot be sure that this equates equally with non-BME service users.

### **2.4 Please list here any improvements that you think could be made for people experiencing disadvantage because of their race:**

- Analyse census data to more accurately identify written language requirements and respond appropriately.
- Provide translatable information about anti-social behaviour on hate incidents on the website.
- Investigate if potential under-reporting is taking place through the analysis of the profile of those reporting incidents against baseline resident profile data. If there is evidence to suggest that this is the case, put in place mechanisms to identify why this is happening and the service improvements that are necessary to address this.
- Satisfaction Survey to be analysed annually against the diversity strands, including race, to ensure that satisfaction levels with the service are, at least, equal to those of non-BME service users.
- Put in place a plan to capture the remaining 20% of customer census data. It is probable that customers who have not returned a form include those whose first language is not English. Potentially, therefore, these customers include those who have the most difficulty in accessing information on service provision.
- Continue to identify minority populations amongst HHL tenants and put in place race awareness training tailored to meet these needs.

<b>3.1</b>	<b>Disability:</b>
List below any relevant customer information that already exists in relation to the service. This could include monitoring information, customer feedback and consultation, complaints etc.	
<p><b>Resident Census Data</b></p> <p><b>i. Disability and Carers</b></p> <ul style="list-style-type: none"> <li>▪ Of the completed forms received 38.3% of tenants (1,550) described themselves as being disabled, of these: <ul style="list-style-type: none"> <li>➤ 72.3% are physically disabled</li> <li>➤ 7.8% are visually impaired</li> <li>➤ 18.9% are hearing impaired</li> <li>➤ 18.7% have mental ill health</li> <li>➤ 5.8% have a learning disability</li> <li>➤ 15.1% have 'other' disabilities</li> </ul> <p><i>(the above figures will not add up to 100% as an individual may have more than one type of disability)</i></p> </li> <li>▪ 921 households were claiming Disability Living Allowance.</li> <li>▪ 881 households (26.9%) received some kind of support. Of these the highest number of responses was 398 for 'a relative' and 257 for 'a support worker.'</li> </ul>	

<b>3.2</b>	<b>Identify the ways in which your service seeks to promote fair access to people who may be disadvantaged because of their disability:</b>
<b>People with physical or mobility impairments</b>	<ul style="list-style-type: none"> <li>▪ All three of our officers at Legion Way, City Centre and South Wye are wheelchair accessible.</li> <li>▪ Anti-Social Behaviour Officers will offer a home visit to those reporting ASB or hate incidents, or arrange to meet at some other mutually agreed location if this is preferred.</li> <li>▪ We do not insist on written Log Sheets for evidence collection. Voice recording can be provided and we will get the information typed up.</li> <li>▪ Our noise monitoring equipment has a remote control facility. This assists people with limited mobility as they do not have to get to the room in which the equipment is located in order to switch it on.</li> <li>▪ We provide a floating support service to older and disabled residents, where there is an identified support need. Where appropriate, Officers will make referrals to enable victims or perpetrators to access our own Housing Support Service or other floating support providers operating</li> </ul>

<b>3.2</b>	<b>Identify the ways in which your service seeks to promote fair access to people who may be disadvantaged because of their disability:</b>
	<p>in the county.</p> <ul style="list-style-type: none"> <li>▪ The 'Accessibility' section of our website provides navigation assistance for people who have restricted mobility and may prefer to use the keyboard rather than a mouse to move around the site.</li> <li>▪ The tenant census form asks about physical and mobility impairments. This information will be logged on our Orchard database and will enable Officers to provide a service, which is more effectively tailored to individual needs.</li> <li>▪ Our Equality &amp; Diversity Framework sets out our commitment to do all that we can to eliminate discrimination in all areas of diversity, including disability.</li> </ul>

<b>Identify any adverse impact or barriers:</b>	
<ul style="list-style-type: none"> <li>▪ Potentially, attitudinal barriers – some people may have pre-conceived ideas about what disabled people are like, probably because they have had little contact with them in the past.<sup>1</sup> This can lead to patronising attitudes or intolerance. People can, unintentionally, adopt a discriminatory attitude by making an incorrect assumption about a disabled person.</li> <li>▪ Potential under-reporting - until the profile of those reporting ASB/Hate Incidents is analysed consistently against baseline resident profile data, we cannot be certain that adverse impacts or barriers are not operating for those who may be disadvantaged because of their disability.</li> <li>▪ Until satisfaction levels with the ASB/Hate Incidents service is analysed consistently by disability we cannot be sure that this equates equally with service users who are not disabled.</li> </ul>	

<b>People with sensory impairments</b>	<ul style="list-style-type: none"> <li>▪ Our website has been constructed to conform to level Double-A of the WC3 Web Content Accessibility Guidelines 1.0: <ul style="list-style-type: none"> <li>➤ There are three text sizes ranging from medium to extra large.</li> <li>➤ All pages have 'text only' versions; which allows the site to be viewed without any images or colour.</li> <li>➤ Once in 'text only' mode, the colour scheme of the page can be changed to suit individual needs.</li> </ul> </li> </ul>
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<sup>1</sup> Information taken from Disabled Living Foundation – Disability Awareness Factsheet

	<ul style="list-style-type: none"> <li>➤ The website has a browsaloud facility which enables all information on the website to be read out aloud.</li> <li>▪ Our Anti-Social Behaviour information leaflet and our Anti-Social Behaviour Statements of Policy and Procedure can be made available in Large Print, Braille or on Audio Cassette. This also applies to our Hate Incidents customer information.</li> <li>▪ Written procedures are in place for HHL colleagues to access BSL signers. The comprehensive step-by step guidance is published on our intranet. In addition, all front-line officers have received training on how to access this service.</li> <li>▪ Housing Officers and Anti-Social Behaviour Officers carry mobile hearing loops when out on visits.</li> <li>▪ All our office reception areas are fitted with hearing loops.</li> <li>▪ Anti-Social Behaviour Officers will offer a home visit to those reporting incidents, or arrange to meet at some other mutually agreed location if this is preferred.</li> <li>▪ We provide a floating support service to older and disabled residents, where there is an identified support need. Where appropriate, Officers will make referrals to enable victims or perpetrators to access our own Housing Support Service or other floating support providers operating in the county.</li> <li>▪ The tenant census form asks about sensory impairments. This information will be logged on our Orchard database and will enable Officers to provide a service, which is more effectively tailored to individual needs.</li> </ul>
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<b>Identify any adverse impact or barriers:</b>	
	<ul style="list-style-type: none"> <li>▪ Potentially, attitudinal barriers – as above</li> <li>▪ Potential under-reporting – as above</li> <li>▪ Lack of analysis of satisfaction levels by disability – as above</li> </ul>

<b>People with learning disabilities</b>	<p>This section includes specific learning difficulties such as dyslexia, where the disability relates to reading, writing and spelling.</p> <p>Where this question had been completed on the Resident Census form, 7.3% of residents (240 people) where this question has been answered said that they had difficulties with reading and writing.</p> <ul style="list-style-type: none"> <li>▪ For people who have difficulties with reading and writing Our Anti-</li> </ul>
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	<p>Social Behaviour leaflet and our Anti-Social Behaviour Statements of Policy and Procedure can be made available on Audio Cassette. This is also the case for our Hate Incidents customer information.</p> <ul style="list-style-type: none"> <li>▪ We do not require reports of ASB/Hate Incidents to be put in writing, these can be reported by telephone or face-to-face at any of our offices.</li> <li>▪ We do not insist on written Log Sheets for evidence collection. Voice recording can be provided and we will get the information typed up.</li> <li>▪ We provide a floating support service to older and disabled residents, where there is an identified support need. Where appropriate, Officers will make referrals to enable victims or perpetrators to access our own Housing Support Service or other floating support providers operating in the county.</li> <li>▪ The tenant census form asks about learning disabilities. This information will be logged on our Orchard database and will enable Officers to provide a service, which is more effectively tailored to individual needs.</li> </ul>
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<b>Identify any adverse impact or barriers:</b>	
	<ul style="list-style-type: none"> <li>▪ Potentially, attitudinal barriers – as above</li> <li>▪ Potential under-reporting – as above</li> <li>▪ We do not currently have procedures in place to provide main information in easy read/pictorial formats</li> <li>▪ Lack of analysis of satisfaction levels by disability – as above</li> </ul>

<b>People who use mental health services:</b>	<ul style="list-style-type: none"> <li>▪ ASB/Hate Incidents can affect a person's physical and mental health. Victims may become ill as a result of their experience, or such incidents may exacerbate an existing condition. Some perpetrators may also have mental health issues that can affect their behaviour.</li> <li>▪ If there is reason to believe that a perpetrator may be suffering from a disability, which can include, mental illness, it is necessary to ensure that actions comply with the requirements of the Disability Discrimination Act 2005. Our Anti-Social Behaviour Procedure includes a section relating to this legislation and a process has been put in place to ensure compliance.</li> <li>▪ As noted above, we provide a floating support service to older and disabled residents, where there is an identified support need.</li> <li>▪ The Resident Census Form asks about mental ill health. This</li> </ul>
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information will be logged on our Orchard database and will enable Officers to provide a service, which is more effectively tailored to individual needs.

**Identify any adverse impact or barriers:**

- Potentially, attitudinal barriers – as above
- Potential under-reporting – as above
- Lack of analysis of satisfaction levels by disability – as above

**People who have a non-visible condition such as epilepsy or diabetes:**

- People with epilepsy and diabetes are covered by the terms of the Disability Discrimination Act 2005, as both are considered to be long-term health conditions.
- As above, if there is reason to believe that a perpetrator may be suffering from a disability it is necessary to ensure that our actions comply with the requirements of the Disability Discrimination Act 2005.
- As above, we provide a floating support service to older and disabled residents, where there is an identified support need.
- The tenant census form asks about long-term illness. This information will be logged on our Orchard database and will enable Officers to provide a service, which is more effectively tailored to individual needs.

**Identify any adverse impact or barriers:**

- Potentially, attitudinal barriers – as above
- Potential under-reporting – as above
- Lack of analysis of satisfaction levels by disability – as above

**3.3 Please list here any improvements that you think could be made for people experiencing disadvantage because of their disability:**

- Review customer care training, paying specific attention to the needs of disabled customers through the inclusion of Disability Awareness training.
- Satisfaction Surveys to be analysed annually to ensure that disabled service users are, at least, as equally satisfied with service provision as service users who are not disabled.

<b>3.3</b>	<b>Please list here any improvements that you think could be made for people experiencing disadvantage because of their disability:</b>
<ul style="list-style-type: none"> <li>▪ Investigate if there is a need to put in place procedures to access main documents in easy read/pictorial formats.</li> <li>▪ Investigate if there a need to put in place procedures to access Makaton signers.</li> <li>▪ Investigate if potential under-reporting is taking place through the analysis of the profile of those reporting incidents against baseline resident profile data. If there is evidence to suggest that this is the case, put in place mechanisms to identify why this is happening and the service improvements that are necessary to address this.</li> <li>▪ Increase customer involvement in the development of the Disability Equality Scheme (DES) 2008-2011 and its associated Action Plan as this will impact upon the delivery of front-line services such as those relating to ASB/Hate Incidents.</li> <li>▪ Put in place a plan to capture the remaining 20% of customer census data. It is probable that customers who have not returned a form include those who have difficulty with reading and writing. Potentially, therefore, these customers include those who have the most difficulty in accessing information on service provision.</li> </ul>	

<b>4.1</b>	<b>Religion or belief</b>
<p><b>List below any relevant customer information that already exists in relation to the service. This could include monitoring information, customer feedback and consultation, complaints etc.</b></p>	

<b>i. Census Data</b>		
<b>Religion</b>		
	Total	%
Christian	2,798	79.17
Buddhist	8	0.23
Hindu	3	0.08%
Muslim	8	0.23
Jewish	5	0.14
Sikh	2	0.06
None	688	19.47
Other	22	0.62
<p>170 respondents 'preferred not to say.'</p> <p>The resident census data received to date shows that, of the tenants who indicated that they had a religion, only a small number identified this to be other than Christian.</p>		

<b>4.2</b>	<b>Identify the ways in which your service seeks to promote fair access to people who may be disadvantaged because of their religion or belief:</b>
	<ul style="list-style-type: none"> <li>▪ Our Equality &amp; Diversity Framework and Action Plan 2008-2011 sets out our commitment to doing all that we can to eliminate discrimination in all areas of diversity, including religion or belief.</li> <li>▪ Our Hate Incidents information leaflet, 'Discrimination &amp; Prejudice Hurts,' makes clear that these incidents include those motivated by hatred or prejudice because of someone's religion or belief.</li> </ul>
<b>4.3</b>	<b>Identify any adverse impact or barriers:</b>
	<ul style="list-style-type: none"> <li>▪ Potentially, a lack of awareness relating to cultural and religious sensitivities and observances.</li> <li>▪ Potential under-reporting – until the profile of those reporting ASB/Hate Incidents is analysed consistently against baseline resident profile data, we cannot be certain that adverse impacts or barriers are not operating for those who may be disadvantaged because of their religion or belief.</li> <li>▪ Until satisfaction levels with the ASB/Hate Incidents service is analysed consistently by religion or lack of religion, we cannot be sure that these are consistent across the service.</li> </ul>
<b>4.4</b>	<b>Please list here any improvements that you think could be made for people experiencing disadvantage because of their religion or belief:</b>
	<ul style="list-style-type: none"> <li>▪ Put in place processes to ensure that HHL colleagues are aware of religious and cultural sensitivities and that these are observed in service planning and delivery.</li> <li>▪ Investigate if potential under-reporting is taking place through the analysis of the profile of those reporting incidents against baseline resident profile data. If there is evidence to suggest that this is the case, put in place mechanisms to identify why this is happening and the service improvements that are necessary to address this.</li> <li>▪ Satisfaction Surveys to be analysed annually by all strands of diversity, including religion or belief, to ensure that satisfaction levels are consistent across our resident base.</li> </ul>

<b>5.1</b>	<b>Sexual Orientation</b>  <b>List below any relevant customer information that already exists in relation to the service. This could include monitoring information, customer feedback and consultation, complaints etc.</b>
	<p><b>i. Census Data</b></p> <p>As at November 2008 1.1% of respondents (33 people) described their sexuality as gay, lesbian or bisexual.</p> <p>Of these, 13 people reported being victims of hate incidents. Eight people reported being victims of anti-social behaviour.</p> <p>For clarity, the Census question asks if people have 'ever' been victims and the incidents may not therefore, have occurred during their HHL tenancy. Irrespective of this however, the information does, potentially, point to a heightened occurrence of such incidents amongst our gay, lesbian or bisexual residents.</p> <p>We have provided information on ASB/Hate Incidents to those residents who identified on their Census form that they would like to receive this.</p> <p>We have contacted, in confidence, those residents who identified on their Census form that they would like us to do so.</p>
<b>5.2</b>	<b>Identify the ways in which your service seeks to promote fair access to people who may be disadvantaged because of their sexual orientation:</b>
	<ul style="list-style-type: none"> <li>▪ Our Hate Incidents information leaflet, 'Discrimination &amp; Prejudice Hurts,' makes clear that these incidents include those motivated by hatred or prejudice because of someone's sexual orientation.</li> <li>▪ Our Equality &amp; Diversity Framework and Action Plan 2008-2011 sets out our commitment to doing all that we can to eliminate discrimination in all areas of diversity, including sexual orientation.</li> <li>▪ Our Tenancy Agreement recognises the property succession rights of same sex couples.</li> <li>▪ Our Lettings Policy bedroom eligibility criteria for couples and applicants with children apply equally irrespective of sexual orientation.</li> </ul>
<b>5.3</b>	<b>Identify any adverse impact or barriers:</b>
	<ul style="list-style-type: none"> <li>▪ Potential under-reporting – until the profile of those reporting ASB/Hate Incidents is analysed consistently against baseline resident profile data, we cannot be certain that adverse impacts or barriers are not operating for those who may be disadvantaged because of their sexual orientation.</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Until satisfaction levels with the ASB/hate incidents service is analysed consistently by sexual orientation we cannot be sure that these are consistent across our resident base.</li> <li>▪ Potentially, negative stereotyping</li> </ul>
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<b>5.4.</b>	<b>Please list here any improvements that you think could be made for people experiencing disadvantage because of their sexual orientation:</b>
	<ul style="list-style-type: none"> <li>▪ Investigate if potential under-reporting is taking place through the analysis of the profile of those reporting incidents against baseline resident profile data. If there is evidence to suggest that this is the case, put in place mechanisms to identify why this is happening and the service improvements that are necessary to address this.</li> <li>▪ Satisfaction Surveys to be analysed annually by all strands of diversity, including sexual orientation, to ensure that satisfaction levels are consistent across our resident base.</li> <li>▪ Ensure that front-line officer equalities training includes sexual orientation.</li> </ul>

<b>6.1</b>	<b>Identify the ways in which your service seeks to promote fair access to people who may be disadvantaged because of their age:</b>
	<ul style="list-style-type: none"> <li>▪ Our Hate Incidents information leaflet, 'Discrimination &amp; Prejudice Hurts,' makes clear that these incidents include those motivated by hatred or prejudice because of someone's age.</li> <li>▪ Our Equality &amp; Diversity Framework sets out our commitment to doing all that we can to eliminate discrimination in all areas of diversity, including age.</li> </ul>

<b>6.2</b>	<b>Identify any adverse impact or barriers:</b>
	<ul style="list-style-type: none"> <li>▪ Potential under-reporting – until the profile of those reporting ASB/Hate Incidents is analysed consistently against baseline resident profile data, we cannot be certain that adverse impacts or barriers are not operating for those who may be disadvantaged because of their age.</li> <li>▪ Until satisfaction levels with the ASB/hate incidents service is analysed consistently by age we cannot be sure that these are consistent across our resident base.</li> </ul>

<b>6.3</b>	<b>Please list here any improvements that you think could be made for people experiencing disadvantage because of their age:</b>
	<ul style="list-style-type: none"> <li>▪ Investigate if potential under-reporting is taking place through the analysis of the profile of those reporting incidents against baseline resident profile data. If there is evidence to suggest that this is the case, put in place mechanisms to identify why this is happening and the service improvements that are necessary to address this.</li> <li>▪ Satisfaction Surveys to be analysed annually by all strands of diversity, including age, to ensure that satisfaction levels are consistent across our resident base.</li> </ul>

<b>7.1 Gender</b>	
<b>List below any relevant customer information that already exists in relation to the service. This could include monitoring information, customer feedback and consultation, complaints etc.</b>	
<p><b>i. Census Data</b></p> <p>As at November 2009, 61.5% of tenants who had returned a Resident Census form were female and 38.5% male.</p>	

<b>7.2</b>	<b>Identify the ways in which your service seeks to promote fair access to people who may be disadvantaged because of their gender:</b>
	<ul style="list-style-type: none"> <li>▪ Our Hate Incidents information leaflet, 'Discrimination &amp; Prejudice Hurts,' makes clear that these incidents include those motivated by hatred or prejudice because of someone's gender.</li> <li>▪ Our Equality &amp; Diversity Framework sets out our commitment to eliminating discrimination in all areas of diversity, including gender.</li> </ul>

<b>7.3</b>	<b>Identify any adverse impact or barriers:</b>
	<ul style="list-style-type: none"> <li>▪ Potential under-reporting – until the profile of those reporting ASB/Hate Incidents is analysed consistently against baseline resident profile data, we cannot be certain that adverse impacts or barriers are not operating for those who may be disadvantaged because of their gender.</li> <li>▪ Until satisfaction levels with the ASB/Hate Incidents service is analysed consistently by gender we cannot be sure that these are consistent across our resident base.</li> </ul>

<b>7.4</b>	<b>Please list here any improvements that you think could be made for people experiencing disadvantage because of their gender:</b>
	<ul style="list-style-type: none"> <li>▪ Ensure all information relating to the service is gender neutral, or addresses specific issues relating to gender</li> <li>▪ Investigate if potential under-reporting is taking place through the analysis of the profile of those reporting incidents against baseline resident profile data. If there is evidence to suggest that this is the case, put in place mechanisms to identify why this is happening and the service improvements that are necessary to address this.</li> <li>▪ Satisfaction Surveys to be analysed annually by all strands of diversity, including gender, to ensure that satisfaction levels are consistent across our resident base.</li> </ul>
<b>8.1</b>	<b>Identify the ways in which your service seeks to promote fair access to people who may be disadvantaged for other reasons:</b> <i>(This could include, for example, those experiencing rural isolation, or on low incomes etc)</i>
	<ul style="list-style-type: none"> <li>▪ Officers deliver the same level of service to all HHL residents experiencing ASB/Hate Incidents irrespective of where they live or their income, this will include, for example, offering a home visit or a meeting at some other customer preferred location.</li> <li>▪ In addition, Rural Road Shows have been undertaken to ensure that potentially isolated residents are aware of the services provided, including those relating to ASB/Hate Incidents.</li> </ul>
<b>8.2</b>	<b>Identify any adverse impact or barriers:</b>
	<p>In relation to rural hate crime, the publication 'Hate Crime, Delivering a Quality Service,' (Association of Chief Police Officers, March 2005), states that there is substantial evidence that hate crime is a fact of rural life and its impact on victims can leave them particularly isolated and vulnerable to repeat victimisation.</p> <p>In addition, there is some evidence to suggest that:</p> <ul style="list-style-type: none"> <li>▪ The need to preserve anonymity in a rural community can undermine a willingness to report incidents and to seek access to support.</li> <li>▪ Awareness of services and other sources of help can also be limited if there is nowhere to advertise or disseminate this information locally.</li> </ul>
<b>8.3</b>	<b>Please list here any improvements that you think could be made for people experiencing disadvantage for other reasons:</b>
	<p>Information relating to the ASB/Hate Incidents Service is already published on our website and leaflets are available in offices. However, the availability of the service should be promoted at every opportunity.</p>

### 3. PARTNERSHIP WORKING, PROCUREMENT AND COMMISSIONING

The following questions relate to the financial years 2008-2011 and only apply if your service area:

- a) has/or is employing a contractor/s and
- b) HHL's Standing Orders and Financial Regulations apply

#### 3.1 How do you ensure contractor compliance with HHL's approach to equality and diversity?

Not applicable to the ASB/Hate Incidents Service.

### 4. CONSULTATION

#### 4.1 Please describe the consultation processes you have undertaken in relation to this Equality Impact Assessment:

- Consultation undertaken with the Herefordshire Tenants Disability Group at their meeting on 19<sup>th</sup> February 2009
- Consultation undertaken with the Rainbow Forum (LGB Group) on 26<sup>th</sup> March 2009
- Further consultation will need to be undertaken around issues relating to, for example, race. This will be done as part of the work that is being undertaken in our Tenancy Services Team to more effectively involve our BME residents.

### 5. ACTION PLANNING

- 5.1 Having completed your assessment of what needs to be changed, or what could be improved, the next stage is to identify what actions are necessary to achieve this. The Action Plan template that you will need to complete is the same as that used for annual service planning and is shown overleaf.

### 6. MONITORING AND REVIEW

- 7.1 Once you have completed the Equality Impact Assessment and Action Plan you will need to present this to the Diversity Working Group for approval.
- 7.2 Any agreed actions arising out of the Equality Impacts Assessment will need to be included in your annual service plan so that delivery can be monitored as an integral part of the service planning process.

<b>Date Completed:</b>	January 2009	<b>Date presented to the Diversity Working Group:</b>	31 <sup>st</sup> March 2009
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[Name of] Action Plan				
Ref	Specific Outcome	How this will be Measured	Milestones to Achieve this outcome	Realistic Timeline
<b>Key to progress monitoring:</b>				
<b>RED</b>	- danger. Not on schedule to meet deadline set. Extra work or resource needed to meet this Action or factors external to the team prevent it being met as			
<b>AMBER</b>	- be alert. Work has commenced, extra resource (time, budget, people) have now been committed. Deadline will be met if progress continues in this way			
<b>Green</b>	- Complete or on target to complete by given date			
<b>A target date that needs to be amended for whatever reason will be struck through rather than deleted and a new date added</b>				
<b>Plan approved by:</b>				<b>Date:</b>